

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

C. JACKSON HOOVER, *et al.* on  
behalf of themselves and all others  
similarly situated,

*Plaintiffs,*

v.

STRATEGIC CAPITAL PARTNERS,  
LLC, *et al.*,

*Defendants.*

No. 1:21-cv-01299-SEG

**PLAINTIFFS' MOTION FOR LEAVE TO FILE  
SECOND AMENDED COMPLAINT**

Under Federal Rule of Civil Procedure 15(a)(2), and for the reasons set forth in the accompanying and contemporaneously filed Brief in Support of Motion for Leave to File Second Amended Complaint, Plaintiffs respectfully move this Court for leave to file a Second Amended Complaint that addresses this Court's holding that Plaintiffs had not sufficiently alleged facts that would plausibly suggest that Defendants Frazier & Deeter and Cherry Bekaert f/k/a Conexis knew that the representations contained in the Schedule K-1s and associated cover letters were fraudulent. *See* MTD Order at 142-145 and n. 48; *see also* MTD Order at 199, 205-206. Plaintiffs attach to this Motion a redlined and clean version of the proposed Second Amended Complaint for the Court's convenience. As set out in the

accompanying Brief in Support of Motion for Leave to File Second Amended Complaint, the Motion should be granted.

This 18<sup>th</sup> day of September, 2023.

Respectfully submitted,

/s/ Jeven R. Sloan

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on September 18, 2023, a true and correct copy of the foregoing document was filed with the Clerk of the Court by using the CM/ECF system.

/s/ Jeven R. Sloan

Jeven R. Sloan

**CERTIFICATE OF CONFERENCE**

The undersigned conferred with counsel for the Defendants regarding the relief requested herein and was informed that the Defendants oppose this Motion.

/s/ Jeven R. Sloan

Jeven R. Sloan

**CERTIFICATE OF COMPLIANCE**

The undersigned certifies that the foregoing document was prepared using Times New Roman 14-point font in accordance with Local Rule 5.1

/s/ Jeven R. Sloan

Jeven R. Sloan